

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:

Dora M. Williams aka Dora Mae
Williams

Debtor.

Bankruptcy Case No.: 21-00642-HB

Chapter: 13

**AMENDED OBJECTION TO CONFIRMATION OF PLAN
AND MEMORANDUM IN SUPPORT OF THEREOF**

U.S. Bank Trust National Association, not in its individual capacity but solely as collateral trust trustee of FirstKey Master Funding 2021-A Collateral Trust ("U.S. Bank"), by and through its undersigned counsel, hereby objects to the confirmation of the Debtor's plan and motion to value lien.

The basis for the objection is that the plan does not comply with 11 U.S.C. §1325 (a)(5). Specifically, the plan does not propose adequate payments in order to protect the interests of U.S. Bank Trust in the collateral, specifically the real property and improvements located at 636 Archie Ware Road, Ridge Spring, South Carolina 29129 (property may also be known as 629 Archie Ware Road, Johnston, South Carolina).

Further, U.S. Bank Trust objects to the valuation of its collateral pursuant to 11 U.S.C. 1325(b)(2). The basis for the objection is the loan is secured solely by real property which is the Debtor's residence and, therefore, is not subject to valuation pursuant to 11 U.S.C. §506. A copy of the mortgage, including the Affixation Affidavit, is attached hereto and incorporated herein by reference.

WHEREFORE, having objected to the confirmation of the proposed plan and motion to value lien, U.S. Bank Trust prays that the confirmation of the Debtor's plan and motion to value

lien be denied, and the Court grant such other relief as is just and proper.

Respectfully submitted,

Crawford & von Keller, L.L.C.

By: 

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Attorneys U.S. Bank Trust National Association,
not in its individual capacity but solely as
collateral trust trustee of FirstKey Master
Funding 2021-A Collateral Trust

June 7, 2021

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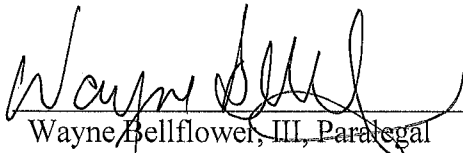
CERTIFICATE OF SERVICE

This is to certify, that I, Wayne Bellflower, III, a Paralegal with the firm of Crawford & von Keller, LLC, am this day serving on the persons indicated below the Amended Objection to Confirmation of Plan and Memorandum in support thereof on behalf of U.S. Bank Trust National Association, not in its individual capacity but solely as collateral trust trustee of FirstKey Master Funding 2021-A Collateral Trust in this matter by placing a copy of same in the United States Mail, postage pre-paid, in envelopes addressed as follows:

Dora M. Williams aka Dora Mae Williams
636 Archie Ware Road
Ridge Spring, SC 29129

V. Lee Ringler , Esquire
808 Greene Street, Ste. 200
Augusta, GA 30901

William K. Stephenson, Jr.
(via electronic notice)


Wayne Bellflower, III, Paralegal

Columbia, SC

June 7, 2021